REMARKS:

Status

After this response, claims 1 to 29 are pending, with claims 12 to 29 having been added. Claims 2 to 6, 8, 10 and 11 have been amended. Claims 1, 7, 24 and 27 are the independent claims herein.

Specification

The specification was objected to because of the length of the abstract. Applicant has amended the abstract to be less than 150 words. Accordingly, withdrawal of the objection to the specification is respectfully requested.

Claims Amendments

Claims 2, 3, 4 and 8 have been amended to change "including" to "further including" for stylistic reasons. No change whatsoever in the scopes of the claims is intended by these amendments.

Claims 5, 6, 10 and 11 have been added to change "simulated thread" to "simulated threads" to better match the recitations of "a plurality of [simulated] dynamically-allocated threads" in their base claims. Again, no change whatsoever in the scopes of the claims is intended by these amendments.

Claim Rejections

Claims 1 to 11 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,535,878 (Guedalia). Applicant respectfully traverses this rejection.

Claims 1 to 6: Claim 1 is reproduced below:

> 1. A method including
> simulating a plurality of dynamically-allocated threads using a statically-allocated thread; and
> maintaining state information regarding each dynamically-allocated thread maintained within said statically-allocated thread.

The applied art, namely Guedalia, is not seen by Applicant to disclose or to suggest the foregoing features of claim 1, at least with respect to "simulating a plurality of dynamically-allocated threads using a statically-allocated thread."

In this regard, the threads in Guedalia are understood by Applicant to be actual dynamically-allocated threads, not simulated threads. In particular, Guedalia specifically recites that his "present invention dynamically allocates threads." Guedalia, col. 21, lines 8 and 9. Guedalia's thread manager 116 "concurrently monitors the currently running threads 118." Guedalia, col. 21, lines 40 to 42. Likewise, Guedalia's manage threads step 126 "is constantly monitoring the active threads in the thread pool." Guedalia, col. 22, lines 15 and 16. To Applicant, this language clearly indicates that the threads are actual concurrent dynamically-allocated threads.

In contrast, the method of claim 1 uses a single "statically-allocated thread" to simulate "a plurality of dynamically-allocated threads."

Guedalia does discuss simulation, but in the context of simulating clients for a server test. See Guedalia, col. 20, lines 44 and 45. Applicant sees no indication that these simulated clients resulted in simulated threads, let alone threads simulated by a statically-allocated thread as recited by claim 1.

In view of the foregoing, reconsideration and withdrawal are respectfully requested of the § 102(e) rejection of claim 1 and its dependent claims 2 to 6. Allowance of these claims also is requested.

Claims 7 to 11: Claim 7 is reproduced below:

> 7. Apparatus including a file server system having a statically-allocated thread including a plurality of simulated dynamically-allocated threads, said statically-allocated thread including state information regarding each said simulated thread.

The applied art, namely Guedalia, is not seen by Applicant to disclose or to suggest the foregoing features of claim 7, at least with respect to "a statically-allocated thread including a plurality of simulated dynamically-allocated threads." As discussed above, Guedalia's threads are understood by Applicant to be actual dynamically-allocated threads, not simulated threads. Accordingly, reconsideration and withdrawal are respectfully requested of the § 102(e) rejection of claim 7 and its dependent claims 8 to 11. Allowance of these claims also is requested.

New Claims

New dependent claims 12 to 23 further elaborate upon features recited in their base claims. These claims are believed to be allowable at least for the reasons given above for their base claims.

New claims 24 to 29 recite additional aspects of a method and an apparatus that simulate a plurality of dynamically-allocated threads using a statically-allocated thread. These claims are believed to be allowable in their own right. In particular, Applicant does not see the applied art to disclose or to suggest claim 24's feature of "using a scheduler implemented by said statically-allocated thread to call thread blocks for said plurality of simulated dynamically-allocated threads" or claims 27's feature of "a scheduler implemented by said statically-allocated thread [that is executed] to call thread blocks for said plurality of simulated dynamically-allocated threads."

Closing

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

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Applicant's undersigned attorney can be reached at (614) 486-3585. All correspondence should continue to be directed to the address indicated below.

Respectfully submitted,

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